

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

BLUE SPIKE, LLC, §
§
§ Plaintiff, § CASE NO. 6:12-CV-499-LED
§
vs. § LEAD CASE
§
TEXAS INSTRUMENTS, INC., § JURY TRIAL DEMANDED
§
§ Defendant.

BLUE SPIKE, LLC, §
§
§ Plaintiff, § CASE NO. 6:12-CV-534-LED
§
vs. § CONSOLIDATED CASE
§
VERCURY, INC., § ORAL ARGUMENT REQUESTED
§
§ Defendant. § JURY TRIAL DEMANDED

**DECLARATION OF JUN ZHANG IN SUPPORT OF DEFENDANT VERCURY, INC'S
MOTION TO TRANSFER VENUE TO UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA UNDER 28 U.S.C. §1404(a)**

I, Jun Zhang state and declare as follows:

1. I am the President of Vercury, Inc. ("Vercury"), a defendant in this Action, and provide this declaration in support of Vercury's motion to transfer this Action to the United States District Court for the Northern District of California.
2. I submit this declaration based upon my own knowledge and if called as a witness could competently testify thereto.
3. Vercury is a very small company with its sole office in Palo Alto, California, within the Northern District of California.

4. I am the sole employee of Vercury and live in Dublin, California, within the Northern District of California.

5. Vercury has no office, distributor, sales representative or any other presence in this District or in Texas generally.

6. Vercury has made very few sales of the Accused Products anywhere, and none in this District or Texas generally.

7. Vercury's website, vercury.com, may be used to obtain product information but not to make purchases.

8. Vercury has no ties, substantial or otherwise, to this District or Texas.

9. All of the documents related to the Vercury systems accused by Blue Spike of infringement ("Accused Systems") are in Palo Alto, California.

10. All of the development of the Accused Systems was done in and around Vercury's Palo Alto office.

11. All of the people involved in the development of the Accused Systems are in the Palo Alto area.

12. As the sole employee of Vercury, it would be a great inconvenience to me and Vercury to have to travel to the Eastern District of Texas.

I declare under penalty of perjury under the laws of the Untied States of America that the foregoing is true and correct.

Executed in Dublin, California on January 27th, 2014.

